

Danner, Ward

From: Jennifer DENICOLA <jd18@me.com>
Sent: Monday, June 30, 2014 10:01 AM
To: Armann, Steve
Cc: Huetteman, Tom; Blumenfeld, Jared; Scott, Jeff; Paula Dinerstein; PEER Jeff Ruch
Subject: Re: EPA Comments of the District's PCB Plan -- Clarification on June 4th EPA comment letter on the SMMUSD Comprehensive PCB Plan

Steve,

If the EPA approved this work, then why are you not receiving real time data to confirm what they are doing? Why are you not watching over their procedures? The test results should be shared in real time to you and us to validation truth and transparency.

MU was not party to this back door deal made between you and environ and as such one would think the EPA would be watching this with both eyes wide open.

We have reason to believe that rooms have tested higher than your thresholds (and let me state that we totally don't agree with these thresholds to begin with).

You have no plan and have done a huge disservice to the community and those you are tasked to protect! What rooms are being tested? How are they picking them over others? Are they being don't correctly. Is there bias in this process? Where are the air tests being placed in the room? Are they using high it low volume in the gymnasiums based on its size?

Since no formal plan was approved, when a air test is over 200ng, or a wipe test is high, what is the next step?

This is precisely why approving work prior to having a work plan in place is mismanagement of this project. In addition to not vetting it to MU and not having someone oversee that environ is correctly testing and sharing that data immediately. We hold the Epa responsible for this failure to be transparent and failure to ensure an acceptable workplan is approved and executed properly. This is more evidence that the EPA is not interested in investigating the contaminants at Mhs but finding ways to claim it is within a unscientificly proven yet acceptable range so the EPA doesn't have to enforce TSCA and the district have to remove the illegal PCB's throughout the school. The only true scientific data the EPA has is the emerging health issues tied to PCB's. The information isn't saying PCB's are safer, it is linking disease to PCB congeners. The IARC had determined PCB's are group 1 carcinogens. Based on past history, Soon the EPA will follow suit. The EPA's own scientist state that your science on inhalation is based on ingestion rates and that you don't have enough in inhalation to know what is safe or not. Yet your hanging this entire risk assessment on inhalation. Apparently the EPA has chosen to risk our children's and teachers health rather than be transparent, precautionary and scientifically accurate.

If you don't have those test result now, I highly encourage you to get them immediately and shared them with MU.

Regards

jennifer denicola

Jennifer deNicola

Malibu Unites

www.MalibuUnites.com

Sign Our Petition to Remove Toxicants from Schools

<http://goo.gl/sKR30F>

On Jun 30, 2014, at 7:30 AM, "Armann, Steve" <Armann.Steve@epa.gov> wrote:

Jennifer, at this time we do not have any data from the District for the current work.

Steven S. Armann, Manager
Corrective Action Office (LND-4-1)
USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3352

Fax: 415-947-3533

Email: armann.steve@epa.gov

From: Jennifer DENICOLA [<mailto:jd18@me.com>]

Sent: Friday, June 27, 2014 5:12 PM

To: Armann, Steve

Subject: Re: EPA Comments of the District's PCB Plan -- Clarification on June 4th EPA comment letter on the SMMUSD Comprehensive PCB Plan

Steve,

Please send myself or Kurt any test results from the testing going in at mhs. Our experts should see data at the same time environ and the EPA see it.

Jennifer deNicola

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On Jun 27, 2014, at 3:50 PM, "Armann, Steve" <Armann.Steve@epa.gov> wrote:

FYI

Steven S. Armann, Manager
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75 Hawthorne Street
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Phone: 415-972-3352

Fax: 415-947-3533

Email: armann.steve@epa.gov

From: Armann, Steve

Sent: Friday, June 27, 2014 8:52 AM

To: 'Doug Daugherty'

Cc: Huetteman, Tom; slyon@smmusd.org

Subject: RE: EPA Comments of the District's PCB Plan -- Clarification on June 4th EPA comment letter on the SMMUSD Comprehensive PCB Plan

Doug,

When we requested that both plans be submitted within 30 days, we did not account for the significant data collection activities the District is currently undertaking and how that data will be used to influence the General Plan. Furthermore, as we mention in our letter, the General Plan is not formally required and is essentially a voluntary action by the District. I concur with your clarification regarding the due date for the General Plan.

We look forward to receiving the Malibu High School specific plan next week and working with you throughout the summer as you collect additional data and develop the General Plan.

Please call me if you have any questions or further clarifications.

Steven S. Armann, Manager
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Email: armann.steve@epa.gov

From: Doug Daugherty [<mailto:ddaugherty@Environcorp.com>]

Sent: Thursday, June 26, 2014 12:19 PM

To: Armann, Steve

Cc: Huetteman, Tom; slyon@smmusd.org

Subject: RE: EPA Comments of the District's PCB Plan -- Clarification on June 4th EPA comment letter on the SMMUSD Comprehensive PCB Plan

Dear Steve,

As per our discussions, ENVIRON is seeking clarification and confirmation on the deliverables requested by EPA in its June 4th letter to SMMUSD.

One part of the EPA letter addressed preparing a document with a focus on a Malibu High School (MHS) specific plan to address the four rooms where caulk has been tested and shown to be above 50 ppm PCBs. We appreciate the clarification on the content of this plan during our meeting on June 17th. Our intent is to provide you this MHS-specific plan that addresses areas with tested caulk above 50 ppm PCBs by July 4th.

A second part of your letter addressed revisions to ENVIRON's General Plan for management of potentially PCB containing materials in SMMUSD schools. We understand that your intent is to review this revised General Plan and provide comments on its consistency with national approaches to PCBs in schools. It is our understanding that EPA may concur with the General Plan but will not approve it. As we

discussed, ENVIRON is proposing to use the data and information collected this summer during the inspections and sampling at MHS and Juan Cabrillo Elementary School (JCES) as well as comments provided to date on the General Plan in order to revise the General Plan. As the final data on this summer's activities will not be available until later this summer and early fall, ENVIRON proposed moving the submission of a revised General Plan to EPA until this fall so we can incorporate the data from MHS and JCES into one revised General Plan. We understand that EPA is agreeable to this approach and would like to obtain your confirmation that the revised District General Plan is no longer due to EPA by July 4th.

Please reply to this email to confirm your concurrence regarding the content of the MHS specific plan, which will be delivered to EPA by July 4th, and to confirm that the revised General Plan is no longer due to EPA by July 4. We appreciate EPA's continued dialogue with us on this.

Regards,
Doug



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From: Huetteman, Tom [<mailto:Huetteman.Tom@epa.gov>]
Sent: Wednesday, June 04, 2014 3:14 PM
To: slyon@smmusc.org
Cc: thomas.cota@dtsc.ca.gov; Doug Daugherty; Santos, Carmen; Armann, Steve
Subject: EPA Comments of the District's PCB Plan

Dear Superintendent Lyon,

Attached are EPA's comments on the "Comprehensive PCB-Related Building Materials Inspection, Management, and Removal Plan for Santa Monica-Malibu Unified School District." Per the attached letter, please contact Carmen Santos to schedule a call to discuss these comments. Steve Armann is out on vacation until June 16. During his absence, feel free to contact me or Carmen.

Sincerely,

Tom Huetteman, Assistant Director
RCRA Branch, Land Division, USEPA Region 9
415-972-3751

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